

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**LINEAGE POWER CORP.**

**Plaintiff,**

**v.**

**SYNQOR, INC.**

**Defendant.**

**CASE NO. 2:08cv95**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

**LINEAGE POWER CORPORATION'S COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Lineage Power Corporation ("Lineage" or "Plaintiff") for its complaint against Defendant SynQor, Inc. ("SynQor" or "Defendant") alleges the following:

**THE PARTIES**

1. Plaintiff Lineage is a corporation organized and existing under the laws of Nevada, with its principal place of business at 3000 Skyline Drive, Mesquite, Texas 75149.
2. On information and belief, Defendant SynQor is a corporation organized and existing under the laws of Delaware, with its principal place of business at 155 Swanson Road, Boxborough, Massachusetts 01719. SynQor makes, imports, uses, offers to sell, and/or sells within the United States, including the state of Texas and this judicial District, products including, but not limited to, power converters.

**JURISDICTION AND VENUE**

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction over the matters complained of under 28 U.S.C. §§ 1331 and 1338.

4. SynQor is conducting business on a systematic and continuous basis within the United States, including the State of Texas and this District.

5. SynQor makes, imports, uses, offers to sell, and/or sells within the United States, including the state of Texas and this District, products including, but not limited to, power converters that infringe the patents at issue in this action. These products are marketed to customers, such as telecommunications equipment and network equipment manufacturers, that sell and distribute infringing products throughout the world, including within this District.

6. SynQor is subject to personal jurisdiction in this judicial District because it has committed acts of infringement within this District, and because it has established at least minimum contacts with the forum such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

7. Venue is proper in this district and before this Court pursuant to 28 U.S.C. §§ 1391(b) and (c) and 1400(b) in that SynQor has committed acts of infringement in this district and resides in this district in accordance with 28 U.S.C. §1391(c).

### **GENERAL ALLEGATIONS**

8. Lineage is the assignee and owner of all rights, title, and interest in U.S. Patent No. Re. 36,571 (“the ’571 Patent”), entitled “Low Loss Synchronous Rectifier for Application to Clamped-Mode Power Converters.” The ’571 Patent was duly and legally issued on February 15, 2000 by the United States Patent and Trademark Office. A true and correct copy of the ’571 Patent is attached hereto as Exhibit A.

9. Lineage is the assignee and owner of all rights, title, and interest in U.S. Patent No. 6,191,964 (“the ’964 Patent”), entitled “Circuit and Method for Controlling a Synchronous Rectifier Converter.” The ’964 Patent was duly and legally issued on February 20, 2001 by the

United States Patent and Trademark Office. A true and correct copy of the '964 Patent is attached hereto as Exhibit B.

**COUNT ONE**  
**SynQor's Infringement of the '571 Patent**

10. Each of the foregoing paragraphs is incorporated by reference.

11. SynQor has been and is now infringing, actively inducing infringement of, and/or contributorily infringing the '571 Patent, pursuant to 35 U.S.C. § 271, by making, using, importing, offering to sell, and/or selling power converters having a synchronous rectifier and clamping circuitry as claimed in the '571 Patent. SynQor has committed such acts of infringement with full knowledge of the existence of the '571 Patent and the rights of Lineage with respect thereto. Such acts of infringement by SynQor have been and continue to be willful and deliberate, and Lineage believes such acts will continue in the future unless enjoined by the Court.

12. Accused products, such as power converters having a synchronous rectifier and clamping circuitry, which are used to practice the claims of the '571 Patent, are known by SynQor to be especially made or adapted for use in an infringement of the '571 Patent, and are not staple articles or commodities of commerce suitable for substantial non-infringing uses.

13. SynQor's past and continuing acts of infringement of the '571 Patent have injured Lineage, including by lost sales and diminution of value of the '571 Patent, and thus Lineage is entitled to recover compensatory damages for the infringement in an amount subject to proof at trial.

14. SynQor's past and continuing acts of infringement of the '571 Patent have resulted and continue to result in substantial unjust profits by, and unjust enrichment of, SynQor in amounts to be determined at trial. Such acts of infringement are causing irreparable harm to Lineage and will continue to cause irreparable harm unless enjoined by the Court.

**COUNT TWO**  
**SynQor's Infringement of the '964 Patent**

15. Each of the foregoing paragraphs is incorporated by reference.

16. SynQor has been and is now infringing, actively inducing infringement of, and/or contributorily infringing the '964 Patent, pursuant to 35 U.S.C. § 271, by making, using, importing, offering to sell, and/or selling power converters having a synchronous rectifier and synchronous rectifier control circuitry as claimed in the '964 Patent. Lineage believes such acts of infringement will continue in the future unless enjoined by the Court.

17. Accused products, such as power converters having a synchronous rectifier and synchronous rectifier control circuitry, which are used to practice the claims of the '964 Patent, are known by SynQor to be especially made or adapted for use in an infringement of the '964 Patent, and are not staple articles or commodities of commerce suitable for substantial non-infringing uses.

18. SynQor's past and continuing acts of infringement of the '964 Patent have injured Lineage, including by lost sales and diminution of value of the '964 Patent, and thus Lineage is entitled to recover compensatory damages for the infringement in an amount subject to proof at trial.

SynQor's past and continuing acts of infringement of the '964 Patent have resulted and continue to result in substantial unjust profits by, and unjust enrichment of, SynQor in amounts to be determined at trial. Such acts of infringement are causing irreparable harm to Lineage and will continue to cause irreparable harm unless enjoined by the Court.

**REQUEST FOR RELIEF**

Wherefore, Lineage respectfully requests that the Court:

- A. order trial by jury on all issues so triable;
- B. render judgment finding that SynQor has infringed the '571 and '964 Patents;

- C. find that SynQor's infringement was willful;
- D. issue a permanent injunction preventing SynQor, and those acting in concert or participation with SynQor, from further infringement, inducement of infringement, or contributory infringement of the '571 or '964 Patents;
- E. award compensatory damages to Lineage in an amount to be determined at trial;
- F. award treble damages to Lineage pursuant to 35 U.S.C. §284;
- G. award interest as allowed by law;
- H. declare this case to be exceptional pursuant to 35 U.S.C. § 285 and award Lineage its costs and reasonable attorney fees incurred in connection with this action; and
- I. grant such other and further relief as this Court and the jury may deem just and proper.

Dated: March 5, 2008

Respectfully submitted,

/s/ Michael E. Jones

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